

Decision 15-12-038 December 17, 2015

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Jordan Rosenberg,

Complainant,

vs.

Pacific Bell Telephone Company, dba AT&T
California (U1001C),

Defendant.

Case 13-07-004
(Filed July 12, 2013)

And Related Matter.

Case 14-05-014

Jordan Rosenberg, for himself, Complainant.

David Discher, Attorney for Pacific Bell Telephone
Company, dba AT&T California, Defendant.

**MODIFIED PRESIDING OFFICER'S DECISION
DENYING THE COMPLAINTS OF JORDAN ROSENBERG**

Summary

The complaints filed by Jordan Rosenberg against Pacific Bell Telephone Company dba AT&T California (AT&T) are denied. Mr. Rosenberg has failed to demonstrate that AT&T has violated any provision of the California Public Utility Code or its Rules and Regulations. Therefore, there is no basis upon which he may be granted relief by the Commission.

Case (C.) 13-07-004 and C.14-05-014 are closed.

1. Procedural History

Jordan Rosenberg (Complainant or Mr. Rosenberg) is a residential customer of Pacific Bell Telephone Company, dba AT&T California (Defendant or AT&T). Mr. Rosenberg signed a Complaint (C.) 13-07-004 on May 14, 2013,¹ contending that Defendant's policies and the manner of communication that it uses to process transfers of services are unreasonable.

An Expedited Complaint Procedure (ECP) hearing was held on August 28, 2013, before Administrative Law Judge (ALJ) Richard Clark.

Mr. Rosenberg filed a second complaint, C.14-05-014 against AT&T on May 15, 2014, in which he described circumstances similar to those in his first complaint.

On May 21, 2014, the ALJ terminated the ECP for C.13-07-004 pursuant to Rule 4.5(g)² and ordered that it should be re-calendared as a formal complaint and consolidated with C.14-05-014 for hearing and decision.³

A Prehearing Conference (PHC) on the consolidated Complaints was held on August 12, 2014 before ALJ Patricia Miles. A scoping memorandum setting forth the issues and schedule for the consolidated proceeding issued August 29, 2014.

On October 2, 2014, Mr. Rosenberg e-mailed the ALJ a Motion to Compel the Attendance of Witnesses. On October 3, 2014, the ALJ denied the motion,

¹ The complaint was filed on July 12, 2013 under the Commission's Expedited Complaint Proceeding Procedure (ECP).

² All references to Rules are to the State of California Public Utilities Commission Rules of Practice and Procedure.

³ See ALJ Clark's May 21, 2014 ruling terminating the ECP pursuant to Rule 4.5 and converting the ECP into a Complaint pursuant to Rule 4.2(a).

citing among other things, failure of the Complainant to meet and confer with AT&T to request attendance of witnesses, as required by Rule 11.3.

An Evidentiary Hearing (EH) was held February 11, 2015. Mr. Rosenberg appeared and represented himself. AT&T was represented by counsel. AT&T presented two witnesses⁴ who had served testimony for cross-examination. Mr. Rosenberg declined to cross-examine either of the AT&T witnesses⁵ and also declined to testify on behalf of himself.

The parties filed post-hearing briefs on April 1, 2015.⁶ In his post-hearing brief, Mr. Rosenberg requested further oral argument before the Commission. The request was denied by ruling of the assigned ALJ.⁷

2. The Complaints

2.1. C.13-07-004 Filed May 14, 2013

Mr. Rosenberg's C.13-07-004 (2013 Complaint) alleges unreasonable delays in processing the transfer of his Lifeline service from one Oakland address to another,⁸ after he sent a letter dated January 20, 2013,⁹ to AT&T to request

⁴ AT&T witnesses were: (1) Mark Berry, Director - AT&T Regulatory, and (2) Leland Young, Splicing Technician.

⁵ e.g., See February 11, 2015 Evidentiary Hearing Transcript at 9 line 21 through 14 line 22.

⁶ The briefs were received on April 1, but not properly filed with the Commission until July 21, 2015.

⁷ See e-mail ruling dated April 16, 2015.

⁸ In the interest of preserving Complainant's privacy and to prevent potential compromise of his identity in this public decision, his residence addresses and phone numbers will not be revealed and will be redacted from documents which are attached as Exhibits.

⁹ AT&T Exhibit 2 - January 20, 2013 letter. His letter informs AT&T:

"DO NOT TRY TO CALL ME. DO NOT ASK ME TO CALL YOU. I'm moving. I wish to transfer service to my new home effective now... I don't care if I keep my number

Footnote continued on next page

transfer of his service effective January 21, 2013. AT&T received the letter, but took no action. Its policy is to require that changes of service be requested by phone call or through an internet portal/online website.¹⁰

At the time that Mr. Rosenberg signed the 2013 Complaint on May 14, 2013, his service still had not been transferred and he was continuing to receive bills¹¹ for the prior address. In his 2013 Complaint, Mr. Rosenberg seeks a refund of overcharges as well as compensatory and punitive damages against AT&T.¹² Mr. Rosenberg also requests that the Commission require AT&T to alter its current practices which require customers to submit transfer requests through its online website or by phone. He contends that AT&T should be ordered to accept transfer requests by mail, fax or e-mail (as well as by phone and through its online website).

2.2. C.14-05-014 Filed May 15, 2014

Mr. Rosenberg's second complaint, C.14-05-014 (2014 Complaint), alleges that AT&T again unreasonably failed to process transfer of his service, this time from an address in Oakland to his present address in San Francisco. He attaches

after the move or get a new one. I want exactly the same service I now have – no more, no less. Note that I have lifeline service and bill me according to lifeline rates. I tried to make this change at your website but found it impossible. I tried to use your chat feature but you didn't want to chat with me. If you need to contact me, use the e-mail address above."

¹⁰ It is not clear when AT&T received the January 20, 2013 letter; however, it is reasonable to conclude that the letter would not have been received in time to transfer service the very next day.

¹¹ In its August 2013 Answer, AT&T admits that it continued to bill Complainant \$3.99 per month for Lifeline service through June 18, 2013. It initiated service at the new address on June 25, 2013. Complainant was issued a credit totaling \$18.09 on a final July 23, 2013 bill (*see* AT&T Answer 8/12/13 at 4)).

¹² 2013 Complaint at 3 of 6.

correspondence to the 2014 Complaint showing that he again requested a transfer of service by letter to AT&T on January 29, 2014. The letter contains admonitions which are similar to those in Complainant's January 2013 letter.¹³ Difficulties related to the connection of his service at the new San Francisco address are further addressed in e-mails to AT&T dated March 18 and 19, 2014.¹⁴ In an April 2, 2014 e-mail, Mr. Rosenberg informs AT&T that a technician arrived at his residence on March 24 without an appointment, and that Mr. Rosenberg did not permit him access.¹⁵

Complainant states that AT&T has informed him that services have been transferred from Oakland to the minimum point of entry at his new San Francisco address (a high rise multi-unit apartment building) and that the dial tone is working. However, he has been unable to obtain a dial tone within his unit when he plugs in his phone. He says that he feels mistreated by AT&T

¹³ AT&T Exhibit 3 is the Complainant's January 29, 2014 letter. The letter contains a heading which reads: "Reply by email, text, chat or fax – not phone, not postal mail." The body of the letter reads: "I will not call you. I will take great offense if you tell me to call you. I will take this up with the PUC and eventually sue you but I will not call you. I want you to do something you adamantly don't want to do. I am adamant you do it anyway...I'm moving. I want you to transfer my phone service...Don't send mail to my old address because I won't get it...make the change now. I have lifeline service. Please transfer the lifeline rate. This can't be done online. I tried. You have my phone number. You won't be able to reach me there. Contact me by email."

¹⁴ The e-mails dated March 18, 19 and April 2, 2014, are attached to Complainant's 2014 Complaint.

¹⁵ See 8/12/14 PHC Transcript at 9 line 13 to 10 line 27. At the PHC, Rosenberg explained that he had a service appointment on April 18 with an arrival window of 12 to 4 p.m., but that the technician did not appear until 5:30 p.m., so Rosenberg again did not grant access.

and that he does not believe that AT&T requires an appointment/visit to his apartment to check inside lines before his service can be connected.¹⁶

3. AT&T Response

In its Answer to C.13-07-004 dated August 12, 2013 (August 2013 Answer), Defendant AT&T asserts that its service transfer policies are reasonable and that the difficulties that Complainant has experienced are isolated events.

AT&T served direct testimony in the consolidated complaints dated November 17, 2014, by Mark Berry, Director – AT&T Regulatory (Berry Testimony),¹⁷ to address the issue of why AT&T requires contact via an 800 number or internet portal to effect a change of service location. Mr. Berry also appeared at the EH for cross-examination.

AT&T explains that it does not process requests to transfer service via e-mail or letter for security purposes.¹⁸ AT&T requires customers to call an 800 number, or to use an internet portal at the website att.com/move to process such changes. This permits AT&T to validate the customer's information and to provide appropriate disclosures before making changes to a customer's service.¹⁹ Mr. Berry further explained that LifeLine customers (such as Mr. Rosenberg) may not transfer service online, but must call an 800 number to move their service. This permits AT&T to authenticate that the move request is actually coming from the LifeLine customer and permits AT&T to provide the customer

¹⁶ Id., at 10 lines 4-14.

¹⁷ AT&T Exhibit 1.

¹⁸ AT&T August 2013 Answer at 2.

¹⁹ Id., at 4. *Also see* direct testimony dated November 17, 2014 by Mark Berry, Director – AT&T Regulatory (Berry Testimony).

with Commission-mandated disclosure information (such as installation charges for moving their service).²⁰

With respect to the 2013 Complaint, Mr. Berry testified that AT&T received correspondence from Complainant in 2013 to request a service transfer from one Oakland address to another; however, AT&T promptly informed Mr. Rosenberg that AT&T was unable to process a request received via e-mail or letter. In spite of this, and following Mr. Rosenberg's complaint to the Commission,²¹ AT&T's Office of the President intervened to handle the transfer request outside of the normal transfer process.²²

In AT&T's Answer dated June 23, 2014 (June 2014 Answer) to Mr. Rosenberg's 2014 Complaint, AT&T states that upon receipt of a January 29, 2014, letter²³ from Mr. Rosenberg requesting a change of service from one San Francisco address to another, personnel from AT&T's Office of the President once again processed the change after Mr. Rosenberg again complained to the Commission. Mr. Rosenberg was notified of this in a March 14, 2014 e-mail²⁴ sent by staff in AT&T's Office of the President.

AT&T filed direct testimony dated November 17, 2014, by Leland Young, a Splicing Technician employed by AT&T for 33 years (Young Testimony).²⁵

²⁰ Berry Testimony at 2 Answer 9.

²¹ See EH Transcript at 24 line 19 through 25 line 26.

²² EH Transcript at 25 lines 13-20; 27 lines 8-12. Mr. Berry testified that there are staff within the Office of the President designated to work with the Commission to resolve informal complaints that the Commission receives from AT&T customers.

²³ AT&T Exhibit 3.

²⁴ EH Transcript at 28 line 28 through 29 line 7.

²⁵ AT&T Exhibit 4.

Mr. Young testified that, on June 13, 2014, he made a service call to the building where Mr. Rosenberg resides.²⁶ He states that he obtained the key to the building's telecommunications room from the building's concierge, and was able to confirm that there was a dial tone for the telephone number assigned to Mr. Rosenberg – at the minimum point of entry (MPOE). Mr. Young testified that, after checking for dial tone at the MPOE, he went to the satellite closet serving Mr. Rosenberg's floor to check for dial tone. When he found that the wiring in the closet did not have numbering corresponding to the apartment units on the floor, he went to Mr. Rosenberg's door to request to enter the unit to further investigate that he had connected the correct wires to Mr. Rosenberg's unit. Mr. Young said that, although he explained that he was from AT&T and that there would be no charge for entering the unit, the customer would not permit him to enter the unit.²⁷

AT&T submits that it has made reasonable attempts to connect Mr. Rosenberg's service by dispatching AT&T technicians on more than one occasion to his premises. AT&T also confirms that service has reached the minimum point of entry at Mr. Rosenberg's new address. However, because Mr. Rosenberg has been unwilling to grant access to his apartment to permit technicians to check the inside wiring, AT&T has been unable to determine whether there is a dial tone inside Complainant's unit.²⁸

²⁶ See Young testimony at 1-3.

²⁷ Mr. Young could not confirm whether the person he spoke with at the unit was Mr. Rosenberg since the door was not opened. (See EH Transcript at 36, line 7 through 40, line 13.)

²⁸ See footnote 14 above and 2014 Complaint (including the e-mail as an attachment).

AT&T contends that its obligation under state and federal case law is to assure that there is service to the MPOE at Complainant's apartment building, and that assuring that wiring is connected within the individual units is the responsibility of the building management/or owner.²⁹ AT&T points out that the same is true under its tariff.³⁰ AT&T concludes that, because it has attempted to obtain access to Complainant's residence to check inside wiring, Mr. Rosenberg's own actions in refusing to grant access to service technicians are the reason for any continued lack of service in his apartment.

4. Discussion

The initial questions framed by the scoping memorandum in this proceeding are whether Complainant Mr. Rosenberg may reasonably expect AT&T to accept transfer requests by letter or e-mail and whether AT&T's practice of requiring consumers to make transfer of service requests by either a telephone conversation or an online request, violates Pub.Util.Code § 451.³¹

²⁹ Brief of AT&T dated March 31, 2015 (AT&T Brief), at 7 citing Re Pacific Bell, Decision No. 92-01-023, Opinion 43 Cal. P.U.C.2d 115 (Jan. 10, 1992); Re Accounting for Station Connections and related Ratemaking Effects and Economic Consequences of Customer-Owned Premise Wiring, Decision No. 93-05-014, Opinion 49 Cal. P.U.C.2d 223, 1993 Cal. PUC LEXIS 369 (May 7, 1993). AT&T also cites federal authority regarding the MPOE. In the Matter of Review of Sections 68.104 and 68.213 of the Commission's Rules Concerning Connection of Simple Inside Wiring to the Telephone Network and Petition for Modification of Section 68.213 of the Commission's Rules filed by the Electronic Industries Association, CC Dkt. Nos. 88-57 & RM-5643, Report and Order and Further Notice of Proposed Rulemaking, 67 Rad. Reg. 2d (P&F) 1280, 5 FCC Reg. 4686, 8 Communications Reg. (P&F) 2033, FCC 90-220 (rel. June 14, 1990); *see also* 47 C.F.R. § 68.105.

³⁰ AT&T Brief, at 7 citing AT&T California SCHEDULE Cal. P.U.C. No. A2.1.20 (Tariff Rule 20).

³¹ Section 451 of the California Public Utilities Code requires a public utility to "furnish and maintain such adequate, efficient, just, and reasonable service... and facilities, including telephone facilities...as are necessary to promote the safety, health, comfort and convenience of its patrons, employees, and the public."

The objective of § 451 is to ensure that efficient, just, and reasonable services necessary to promote safety, health, comfort and convenience are provided to the public. AT&T has provided a reasonable explanation about its rationale for requiring customers to request transfer of telephone service in a manner that will permit verification of the customer's identity, and this clearly promotes customer safety. AT&T's practices are consistent with other requirements placed upon telephone corporations, such as those under Pub. Util. Code § 7906, which requires telephone corporations to take adequate steps to insure the privacy of communications over their telephone communication systems.

In contrast, the Complainant Mr. Rosenberg's demands of AT&T have not been reasonable, but capricious. Complainant's letter dated January 20, 2013,³² requests that AT&T transfer his service effective January 21, 2013 – the very next day. This is unreasonable, particularly when considering the time required for mail delivery. More perplexing, however, is why Complainant informs AT&T to refrain from calling him upon receipt of his letter.

Complainant's letter explains that he is frustrated because he is unable to complete the transfer of service through the AT&T website and also unable to utilize the "chat" feature of the website. However, this does not explain Complainant's insistence that the more traditional and most immediate mode of communication (a phone call) may not be utilized to contact him to assist him to implement his transfer request. Complainant's correspondence to AT&T does not give any explanation for his request that AT&T may only contact him by

³² See AT&T Exhibit 2 and footnote 8 above.

e-mail. For instance, Rosenberg does not describe a hearing or speaking incapacity that makes it difficult for him to communicate by phone. Nor does he describe a circumstance which causes him to be completely unavailable by phone (e.g., extended travel which would make him inaccessible other than by e-mail).

Complainant's statement that "I wish to transfer service to my new home *effective now*" is at odds with his refusal to accept a phone call from, or to initiate a phone call to AT&T. This refusal belies the idea that there is urgency to Rosenberg's transfer request.³³

The same is true of Mr. Rosenberg's January 29, 2014 letter, which again tells AT&T that "I will not call you, I will take great offense if you tell me to call you. I will take this up with the PUC and eventually sue you, but I will not call you."³⁴ Although Complainant instructs AT&T to "make the change now," he also instructs them to "reply by email, text, chat or fax – not phone, not postal mail."³⁵

Mr. Rosenberg's letters did not contain information that would allow AT&T to authenticate the request to move service, yet the letters told AT&T not to call him. Additionally, although AT&T has an 800 number that Complainant

³³ Similarly, although Complainant correctly points out in his post hearing brief (at 3) that he is not obligated to permit access to his premises when an AT&T technician arrives at his premises without an appointment or later than the scheduled appointment time, his refusal to permit access despite being home belies the idea that he considers connection of service to be urgent. Unfortunately, because Complainant refused to cross-examine the service technician, or testify himself about his reasons for refusing to grant access to his premises, there is no way of evaluating whether Complainant was reasonable or unreasonable in granting access.

³⁴ AT&T Exhibit 3.

³⁵ Additionally confusing is why Complainant tells AT&T it may reply by "text" (i.e., a written message sent via phone) but cannot call him by phone.

and other customers may call “free of charge” to make service changes, Mr. Rosenberg refuses to call them.

AT&T’s Office of the President eventually was able to intervene to effectuate the change of service that Complainant requested in 2013. The Office of the President also intervened again in 2014 to assist Mr. Rosenberg. However, these extraordinary steps do not mean that AT&T’s usual practices for handling transfer of service requests from LifeLine customers are unreasonable. AT&T’s method of coordinating LifeLine service moves by requiring customers to call an 800 number is a reasonably efficient process that offers consumer protections and satisfies the requirements of Pub. Util. Code § 451. There is no charge for the call and no cost to the consumer. This said, to avoid future “customized requests,” AT&T is well advised to consider ways in which it can more widely convey its transfer of service procedures to consumers.

In evaluating Mr. Rosenberg’s allegations, we are guided by the standards set forth in Pub. Util. Code § 1702, which provide that a complainant must (a) set forth that a regulated utility has engaged in an act or failed to perform an act; or (b) allege the utility is in violation of any law or commission order or rule. Complainant Mr. Rosenberg has not demonstrated that AT&T has acted (or failed to act) in violation of any law, Commission order or rule.³⁶ We agree with AT&T that, under the circumstances that Complainant Mr. Rosenberg himself

³⁶ In his post hearing brief, Complainant suggests that AT&T should provide a variety of ways to make service change requests and let customers decide which they like best. (*See* page 2.) Although § 451 requires AT&T to furnish service and facilities as are necessary to promote the *convenience* of its patrons, we do not agree that this requires AT&T to give each individual customer the whim to dictate the method of contact most convenient for himself or herself without reason.

imposed, he is not entitled to any penalty for the time it took to move his telephone service.

5. Complainant's Due Process Claims

In Complainant's post hearing brief, Complainant argues that, under Pub. Util. Code § 1705, the ALJ was required to order AT&T employees to come to the evidentiary hearing so that Complainant could question them, and that the ALJ denied him due process by denying his October 2, 2014, e-mailed request for an order to compel individuals employed by AT&T to attend the evidentiary hearing.³⁷

The reasons for denial of Complainant's October 2 e-mail request as set forth in the ALJ's October 3 ruling are straightforward.³⁸ Complainant argues in his post hearing brief that the request to have witnesses attend the evidentiary hearing is not a discovery matter. However, as stated in the ALJ's ruling, Complainant has never explained why he declined to make a good faith effort to meet and confer with AT&T about witnesses before seeking Commission intervention. Complainant also does not explain why he declined to ask a single question or cross-examine the two AT&T witnesses who were present during the

³⁷ There was also lengthy discussion at the EH about the Complainant's October 2 e-mail request and the ALJ's reasons for denying it. *See, e.g.,* EH Transcript at 48 line 17 to 67 line 22.

³⁸ *See e.g.,* EH Transcript at 9 line 21 to 14 line 22, where the ALJ encourages Mr. Rosenberg to cross-examine AT&T witness Mr. Berry, but he declines. Also *see* EH Transcript at 34 line 8 to 36 line 3, where the ALJ encourages Mr. Rosenberg to cross-examine AT&T witness Mr. Young, but he declines.

evidentiary hearing, or show why those witnesses were inadequate to his purposes.³⁹

For similar reasons, Complainant's request for oral argument before the Commission was also properly denied.

6. Conclusion

Complainant has not demonstrated any basis upon which he is entitled to relief by the Commission or to any remedy from AT&T. Complainant was not deprived of due process during the adjudication of this proceeding.

7. Categorization and Need for Hearing

The Instruction to Answer filed on May 15, 2014 categorized this matter as adjudicatory as defined in Rule 1.3(a).

8. Appeal of Presiding Officer's Decision

The Presiding Officer's Decision Denying the Complaints of Jordan Rosenberg prepared by ALJ Patricia Miles, was mailed to the parties on September 30, 2015. The Presiding Officer's Decision was appealed by the Complainant on October 29, 2015. A Response to Complainant's Appeal was filed by AT&T on November 13, 2015.

The Complainant's Appeal merely reargues points already made in earlier briefing and provides no basis for finding that the presiding officer's decision was unlawful or erroneous, as required by Rule 14.4(c). Therefore, we find no merit in the appeal.

³⁹ The EH Transcript reveals that the ALJ gave Complainant Rosenberg opportunity to present evidence during hearing. See 63 lines 25 to 64 line 23, and 66 lines 6 to 14; 66 line 27 to 67 line 19.

9. Assignment of Proceeding

Catherine J.K. Sandoval is the assigned Commissioner, and ALJ Patricia B. Miles is designated as the Presiding Officer in this proceeding.

Findings of Fact

1. The Complainant, Jordan Rosenberg, filed complaints against AT&T on July 12, 2013 and May 15, 2014.

2. The allegations within the complaints must be evaluated under Pub. Util. Code §§ 451 and 1702.

3. AT&T's obligation under state and federal case law and under its tariff with the Commission, is to assure that there is service to the MPOE at a customer's residence.

4. AT&T representatives in the Office of the President were helpful to Complainant and in fact exceeded their legal obligations in attempting to assist him with connection of his telephone service.

5. AT&T technicians made reasonable efforts to assure that Complainant had a dial tone at his residence.

6. Complainant was given opportunities to cross examine AT&T witnesses present at EH but declined to do so.

7. Complainant was given opportunities to testify and present evidence on his behalf at EH but declined to do so.

8. The ALJ explained to Complainant, in writing and at the EH, her reasons for denying Complainant's October 2, 2014 request for an Order to Compel attendance of AT&T witnesses at the EH.

9. The ALJ denied Complainant's request for further oral argument before the Commission under Rule 13.13(a).

10. Complainant filed an Appeal of the Presiding Officer's Decision denying his complaints on October 29, 2015 and AT&T filed a Response to the Appeal on November 13, 2015.

Conclusions of Law

1. AT&T's practice of requiring consumers to make transfer of service requests by either a telephone conversation or an online request is reasonable, and does not violate Pub. Util. Code § 451.

2. Complainant's allegations against AT&T fail to satisfy Pub. Util. Code § 1702 because he has not demonstrated that AT&T has engaged in an act or failed to perform any required act or violated any law or commission order or rule.

3. Complainant has not demonstrated any basis upon which he is entitled to relief by the Commission or to any remedy from AT&T.

4. Complainant's due process rights were not violated by the ALJ's ruling denying his October 2, 2014 request for an Order to Compel attendance of AT&T witnesses at the EH.

5. Complainant is not entitled to further oral argument before the Commission and the request for oral argument made in his post hearing brief was properly denied by the ALJ in her July 16, 2015 ruling.

6. Complainant's appeal does not demonstrate that the presiding's officer's decision was unlawful or erroneous as required by Rule 14.4(c).

O R D E R

IT IS ORDERED that:

1. The complaints filed by Jordan Rosenberg on July 12, 2013 and May 15, 2014 were properly denied.
2. The Appeal of Jordan Rosenberg filed on October 29, 2015 is denied.
3. Case (C.) 13-07-004 and C.14-05-014 are closed.

This order is effective today.

Dated December 17, 2015, at San Francisco, California.

MICHAEL PICKER
President
MICHEL PETER FLORIO
CATHERINE J.K. SANDOVAL
CARLA J. PETERMAN
LIANE M. RANDOLPH
Commissioners